

### **III. REMARKS**

Claims 1-15 are pending in this application. By this amendment, claims 1, 2, 11 and 12 have been amended. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is requested.

Entry of this Amendment is proper under 27 C.F.R §1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicant respectfully requests entry of this Amendment.

Claims 2 and 12 are objected to because of the use of the phrase “the search history comprises a table of previously...”, and related language in independent claims 1 and 11. In response, Applicant has amended the claims, per the recommendation of the Office. Accordingly, Applicant requests withdrawal of the objection.

Claims 1-5 are rejected under 35 U.S.C. §101 because the claimed invention is allegedly directed to non-statutory subject matter. Claims 10-15 are rejected under 35 U.S.C. §101 because the claimed invention is allegedly directed to non-statutory subject matter.

Although claims 10-15 are rejected in the Office Action, because claim 10 is a dependent claim which depends from claim 6; and, claim 11 is an independent claim, Applicant assumes the rejection is a typographical error and the Office meant instead claims “11-15”. Accordingly, Applicant has amended independent claims 1 and 11.

In response to the rejection under §101, Applicant responds that claims 1 and 11 are both directed to statutory subject matter, as defined under 35 USC §101 and have a useful, concrete, and tangible result. For example, claim 1 provides, *inter alia*, a computerized method for searching a knowledge base database that also includes providing a match answer and an alternative answer. See e.g., claim preamble. Further, claims 1 and 11, as amended, include the limitations of both “outputting the match answer” and “outputting the alternative answer”. As a result, Applicant respectfully disagrees with the Examiner’s position and submits that the claimed invention does indeed have a claimed useful practical “real world” application within the technological arts. For example, the claimed invention has a practical application in the technological art of searching and providing information from databases, namely, providing a search engine that provides a match and alternative answer based on a history record of cumulative probability values. The present invention provides a search system and computerized method that may be implemented in a client-side environment, and further provides both high performance and creates user preferences relative to the database. Amongst other tangible, concrete results that the claims provide is that aspects of the present invention include providing a match and alternative answer from the database, by

outputting both the match answer and the alternative answer. As such, Applicant submits that the claimed invention is directed to statutory subject matter.

Regarding claim 11, Applicant again disagrees with the Examiner's position. As stated in MPEP 2106.01, a claimed computer-readable medium encoded with a computer program, such as that presented in claim 11 of the present patent application, is a computer element which defines structural and functional interrelationships between the computer program and the rest of the computer which permit the computer program's functionality to be realized, and is statutory. See *Lowry*, 32 F.3d at 1583-84, 32 USPQ2d at 1035. Accordingly, Applicant requests withdrawal of the rejection.

Claims 1-3, 6-9, and 11-13 are rejected under 35 U.S.C. 102(b) as being anticipated by Bowman et al. (United States Patent No. 6,006,225), hereinafter "Bowman". Claims 4-5, 10, and 14-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bowman in view of Pak et al. (United States Patent Publication No. 2004/0260534), hereinafter "Pak".

With respect to claim 1, Applicant submits the reference cited by the Office, Bowman, does not teach each and every feature of the claimed invention, as is required under 102(b). For example, with respect to independent claim 1, Applicant respectfully submits that the cited reference fails to teach, *inter alia*, inputting the look-up association into an **alternative answer** probability table to identify an **alternative answer category**, wherein the look-up association is based on the match answer **category** and a search

history table. Emphasis added. See claim 1 and similar language in independent claims 6 and 11.

In rejecting claim 1, the Office alleges that Bowman discloses an inputting of the look-up association *et al.* as follows:

"[T]he generation process then maps each query term found in a query and its prefix to other terms used with that particular query. A correlation score is maintained for each related term in the mapping, and is stored in a table (read as determining a look-up association based on the match answer category and a search history table, inputting the look-up association into an alternative answer probability table to identify an alternative answer category) (column 10 lines 25-33, figures 5A, 5B)"

Office Action, page 4, item 07. It appears that the Office is alleging that the sample mappings of both before and after a query, figures 5A and 5B, respectively in Bowman, are a teaching of an alternative answer probability table. Applicant respectfully does not agree that the citation aligns with the allegation. Further, there is not inputting of a look-up association into the mappings in figures 5A/5B in Bowman.

A careful reading of the cited sections (i.e., column 10, lines 25-33), figures 5A and 5B, and Bowman in its entirety, indicates that Bowman is completely devoid of any teaching or suggestion of any kind of inputting of a determined look-up association into any type of probability table, alterative answer or otherwise, as in the claimed invention. In fact, the salient portion of the specification in Bowman (i.e., col. 10, lines 25-33) merely discloses the maintenance of a "correlation score" for each related term in the mapping based on the number of times the related term occurred in combination with the

key term. It is not clear to Applicant which items in the mapping shown in figures 5A and 5B disclose specifically, for example, the match answer, the match answer category, the look-up association, search history table, alternative answer probability table, alternative answer category, and alternative answer. In sum, this cannot amount to a clear teaching and/or suggestion of the aforementioned limitation.

Thus, Bowman does not teach all of the limitations found in claim 1.

Accordingly, Applicant respectfully requests withdrawal of the rejection with respect to claim 1.

Independent claims 6 and 11 were rejected under the same rationale as claim 1. As a result, Applicant herein incorporates the arguments listed above with respect to claim 1.

With respect to dependent claims 2-5, 7-10 and 12-15 Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Further, Pak does not remedy the aforementioned deficiencies in Bowman. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

#### **IV. CONCLUSION**

In light of the above remarks, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,



Date: January 3, 2007

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